

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
SCOTT D. MINNICH, : CHAPTER13
Debtor :
: CASE NO. 1:15-bk-04365 HWV
WILMINGTON TRUST, NATIONAL, :
ASSOCIATION, not in its individual :
capacity, but solely as trustee of :
MFRA TRUST 2014-2, :
Movant :
: v. :
: :
SCOTT D. MINNICH, :
Debtor :
:

ANSWER TO MOTION OF WILMINGTON TRUST, N.A.
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW COMES Debtor, Scott D. Minnich, by and through his undersigned counsel, answering the Motion for Relief from the Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtor had other creditors which resulted in his decision to file a Chapter 13 proceeding.

9. Denied. Debtor demands proof thereof at trial due to a variable rate mortgage.
10. Denied. Debtor is unaware of what counsel time was required to address this matter.
11. Denied. Debtor desires to retain his personal residence.
12. Denied. The averment contains a request by Movant that Debtor cannot consent to.
13. Admitted.

WHEREFORE, Debtor Scott D. Minnich, respectfully requests this Honorable Court to give him a reasonable amount of time to bring the outstanding mortgage balance current.

Respectfully submitted,

LAW OFFICES OF CRAIG A. DIEHL

Date: March 13, 2020

By: /s/ Craig A. Diehl, Esquire, CPA

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